

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

IN RE:	)	Chapter 11
	)	Case No.: 01-01139 (JKF)
W. R. GRACE & CO., <u>et al.</u> ,	)	(Jointly Administered)
	)	
Debtors.	)	Hearing Date: August 25, 2003
	)	@ 12:00 p.m.
	)	Objection Date: August 8, 2003

LIMITED RESPONSE OF WAYNE MORRIS AND HOME/SAVING/TERMITE  
CONTROL, INC., TO DEBTORS' SECOND OMNIBUS  
OBJECTION TO CLAIMS (NON-SUBSTANTIVE)

Wayne Morris and Home Saving Termite Control, Inc., "Morris", by and through their undersigned counsel of record, file this Limited Response to Debtors' Second Omnibus Objection to Claims (the "Second Omnibus Objection"), and in support thereof, state the following:

1. (a) The name of the claimant, their claim number and a description of the basis for the amount of the claim;

Wayne Morris and Home Saving Termite Control, Inc., hereinafter "Morris", timely filed a Proof of Claim for a "Non-Asbestos" Indemnity Claim, which is not yet liquidated, arising from a California state court lawsuit for alleged personal injuries due to application of a termite eradication product, manufactured and distributed by the Debtor, W. R. Grace & Company.

A Notice of Filing of Morris' Proof of Claim was Docketed on March 28, 2002, as docket item # 3568. In Debtors' Second

Omnibus Objection, the claim numbers referenced by the Debtors for Morris' alleged "duplicate" claims are "21" and "386".

- (b) The specific factual basis and supporting legal argument upon which the party will rely in opposing the Omnibus Objection;

Morris does not oppose the Debtors' efforts to dismiss a duplicative claim. However, Morris seeks clarification that its complete claim will survive, in its entirety, subject to the extinguishment of any duplicate claims.

- (c) Any supporting documentation to the extent it was not included with the proof of claim previously filed with the Clerk or Claims Agent, upon which the party will rely to support the basis for and amounts asserted in the proof of claim;

The supporting documentation for Morris' Proof of Claim may be obtained from the Court Docket at docket item # 3568, with additional copies to be produced, upon request to Morris' undersigned counsel.

- (d) The name, address, telephone number and fax number of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the objection and who possesses authority to reconcile, settle, or otherwise

resolve the objection to the Disputed Claim on  
behalf of the claimant.

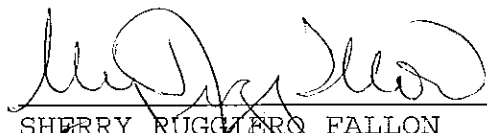
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WHEREFORE, Wayne Morris and Home Saving Termite Control, Inc.,  
respectfully request that the Court enter an Order allowing its  
complete claim to survive, in its entirety, despite expungement of  
any purely duplicative claims as identified by Debtors.

RESPECTFULLY SUBMITTED,

Dated: August 8, 2003



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